## EXHIBIT 22

From: Chloe Houdre <choudre@bsfllp.com>
Date: November 25, 2019 at 2:05:03 PM PST

To: "Prather, Laura" < Laura. Prather@haynesboone.com>

**Cc:** Michael Gottlieb <mgottlieb@willkie.com>, Joshua Riley <jriley@bsfllp.com>, Meryl Governski

<mgovernski@bsfllp.com>

Subject: Ed Butowsky v. David Folkenflik Et Al. Subpoena to Aaron Rich

## **EXTERNAL:** Sent from outside haynesboone

Ms. Prather,

In response to your November 11, 2019, subpoena ("Subpoena") to Mr. Rich in the case of Ed Butowsky v. David Folkenflik, et al., Mr. Rich hereby serves his Responses and Objections to the Subpoena, which are attached. As articulated in the Responses and Objections, Mr. Rich will produce on a rolling basis the productions of the parties and third parties in Aaron Rich v. Ed Butowsky, et al., (the "Rich Litigation"). Mr. Rich will not, however, be producing materials produced to him by Mr. Couch or Mr. Butowsky, as counsel for both have indicated that he will object to our producing those materials in response to this Subpoena.

The materials Mr. Rich is producing today include the productions of:

- (1) Joseph Burkett
- (2) John ("Jack") Burkman
- (3) Ebay
- (4) Roger Stone
- (5) Wigdor LLP
- (6) Beth Bogaerts
- (7) Manuel Chavez
- (8) Fox News
- (9) Thomas Schoenberger; and
- (10) Rod Wheeler

These materials are available at the FTP site, linked below. Please kindly review the Protective Order in the Rich Litigation, also attached, before viewing these productions.

FTP Access Instructions:

FTP URL: ftp2.lighthouseglobal.com

FTP Web URL: https://ftp2.lighthouseglobal.com

FTP folder: 003775\000005\OutsideSubpoena

FTP Login: Outside Subpoena

FTP PW: 46\_359Uo

**Burkett:** 

Zip File Password: \$EchLf9Dra+h

**Burkman:** 

Zip File Password: ti0l\$uprAme9

Ebay:

Zip File Password: 42qC'q"&UVMRC

**Stone:** 

Zip File Password: }3VB2&p\_Qr#5B

Wigdor LLP:

Zip File Password: 2d;GKg%EqkbvA

**Bogaerts:** 

Zip File Password: mi&iHut=5dacUstltHas

**Chavez:** 

Zip File Password: f?\*rA7ruthoP

**Fox News:** 

Zip File Password: c6Cr~7kuYP953:;A

**Schoenberger:** 

Zip File Password: ME&0lchu+lz0Spu

Wheeler:

Zip File Password: xe0Reb=ayOJ=sUtOtlz9

Please let me know if you have difficulty accessing the FTP site.

Regards,

Chloe

## Chloe M. Houdre\*

Associate

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<sup>\*</sup>Admitted in New York. Practice supervised.

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